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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

USA HAPPY BABY INC.,
MICHAEL WEI YUEH LIU, and
JING DONG,

Defendants.

No. 5:19-cr-00027-RGK

GOVERNMENT'S UNOPPOSED MOTION TO
DISMISS DEFENDANT USA HAPPY BABY
INC. AND CERTAIN COUNTS OF THE
INDICTMENT

Trial date: Sept. 10, 2024
Time: 8:30 a.m.

In the interests of justice, the government moves to dismiss Counts Two through Seventeen (wire fraud) and Counts Twenty-eight through Thirty-six (identity theft and tax charges). The government also moves to dismiss defendant USA Happy Baby Inc.

The government will proceed to trial on Count One, conspiracy to commit immigration fraud and international money laundering, and Counts Eighteen through Twenty-seven, substantive international money

1 laundering counts, against remaining defendants Michael Liu and Jing
2 Dong.

3 Counsel for defendants Happy Baby USA Inc., Michael Liu, and
4 Jing Dong were contacted by government counsel and do not oppose this
5 motion.

6 Dated: August 29, 2024

Respectfully submitted,

7 /s/

GREGORY W. STAPLES

8 Assistant United States Attorney
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